

Message

From: Williams, Mike [Mike.Williams@meritenergy.com]
Sent: 6/11/2021 6:33:22 PM
To: Zhang, Qian [Zhang.Qian@epa.gov]
CC: Duggan, Jessica [Duggan.Jessica@epa.gov]
Subject: WY-0000779 Anticipated Bypass Notification

Good Afternoon,

In accordance with Section 3.7.1 of our NPDES Permit for the Maverick Springs facility (WY-0000779), Merit Energy Company is providing EPA a courtesy notification of our intent to temporarily bypass Pit 2 for essential maintenance purposes. We intend to gradually commence the bypass early next week and anticipate Pit 2 will be offline for approximately 3-6 weeks as it is cleaned and refurbished. The facility will continue to discharge through an auxiliary pit during this period and we expect the bypass effluent to be fully compliant with the limits specified by our permit. The following actions and precautions will be taken to ensure compliance:

1. With BIA authorization, an auxiliary earthen pit and diversion channel has been constructed and equipped with an impermeable liner to provide equivalent retention time currently provided by Pit 2.
2. The auxiliary pit has been equipped with an appropriately sized t-siphon and riprap to prevent pollutants or sediment from impacting waters of the US. The auxiliary pit t-siphon outlet will serve as our compliance sampling location for the duration of the anticipated bypass and the effluent will re-enter its normal flowpath.
3. Bird deterrent flagging and barbed wire fencing has been deployed to keep wildlife and livestock out of the produced water treatment flowpath.
4. Prior to the anticipated bypass, precautionary sorbent booms will be set along the flowpath to ensure Waters of the US are adequately protected.
5. Produced water will be slowly introduced to the auxiliary pit so that conditions can stabilize and the effluent can be closely monitored as the bypass is gradually and fully implemented.
6. Frequent sheen observations including crude oil field extraction analyses will be implemented to provide Merit with real-time assurance and documentation that the effluent is compliant. We plan daily observations during the first week, and twice-weekly observations for the balance of the bypass and during the first week flow is returned to Pit 2.
7. Once the throughput stabilizes, an effluent sample will be collected for laboratory analysis during the first week of the anticipated bypass, an oil and grease analysis using EPA Method 1664A will be performed and reported with DMRs.
8. If, at anytime during the bypass, a sheen is observed at the compliance point, Merit will immediately implement a phased well shut-in procedure to increase retention time, proceed to collect samples for laboratory and field analysis, make the proper notifications, and implement other corrective actions as necessary.
9. Merit will provide EPA notification once the Pit 2 refurbishment is complete and produced water is returned to the normal flowpath.

Thank you, should you have any questions or concerns, please don't hesitate to call.

Respectfully,
Mike

Michael A. Williams, P.G.
Regulatory & Government Affairs Professional
Merit Energy Company
1501 Stampede Ave. Unit 9019

Cody, Wyoming 82414

e-mail) mike.williams@meritenergy.com

O) 307-527-2127

M) 307-250-7686